

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

December 22, 2014

VIA E-MAIL AND REGULAR MAIL

Textron, Inc.
c/o Mr. Jamie Schiff
40 Westminster Street
Providence, Rhode Island 02903

RE: Proposed Consent Order
Voluntary Investigation and Remediation Plan Schedule Extension
December 2014 Semi-Annual Voluntary Remediation Progress Report
June 2014 Semi-Annual Voluntary Remediation Progress Report
Manchester Tank Company, HSI No. 10765
811 West Avenue
Cedartown, Polk County, Georgia
Tax Parcel 024-014

Dear Mr. Schiff:

The Georgia Environmental Protection Division (EPD) has received your February 18, 2014 response to our January 16, 2014 comment letter for the above-referenced site. We appreciate your comments and your clarifications regarding the schedule and proposed attainment of cleanup standards for impacted properties. We have also reviewed the December 2014 and June 2014 Semi-Annual Voluntary Remediation Progress Reports and concur with the ongoing course of action. EPD offers the following comments on the documents referenced above.

1. The sampling results for the new extraction wells installed in Unit C along North 8th Street demonstrate significantly higher concentrations than previously shown in the Conceptual Site Model (CSM) for that area. Therefore, the CSM and plume configuration for Unit C should be revised and extraction system design parameters modified accordingly.
2. In Semi-Annual Progress Reports that document soil, groundwater, vapor, or surface water sampling events please provide the field sampling forms, a summary of the field sampling parameters recorded during the sampling events, a discussion of the sampling protocols and methods used, and the laboratory analytical reports.

As you know, the Director has established a standard and policy that properties enrolled in the Voluntary Remediation Program (VRP) must be in compliance with cleanup standards within five (5) years of enrollment. Therefore, EPD is issuing the enclosed proposed Consent Order, which is required to enable your continued participation in the VRP under an extended schedule for corrective action at the site.

Please sign the enclosed Consent Order and return it to this office no later than March 1, 2015. Upon receipt of the signed Consent Order, EPD will issue a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to the execution of the Consent Order. Once the public comment period has expired, EPD will forward a copy of the executed Consent Order to you. In the interim, please continue to implement corrective action in accordance with the schedule outlined in the Corrective Action Plan.

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If you have any questions or concerns, please contact Robin Futch, P.G., PMP of the Response and Remediation Program at (404) 657-8686.

Sincerely,



Jeffrey W. Cown, Chief
Land Protection Branch

c: Andrew P. Romanek, P.E., BCEE, CDM Smith (via email)
J. Thomas Duffey, P.G., CDM Smith (via email)

File: HSI 10765